

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

HELEN RUNGE

*Plaintiff,*

v.

WALTER J. KELLEY; KERRY L.  
BLOOMINGDALE, M.D.; and  
SUNBRIDGE NURSING AND  
REHABILITATION CENTER.

*Defendants.*

Civil Action No. 05-10849-RGS

**MOTION OF DEFENDANT MEDIPLEX OF MASSACHUSETTS,  
INC. d/b/a SUNBRIDGE CARE AND REHABILITATION FOR RANDOLPH'S  
TO DISMISS COUNTS I AND II OF THE COMPLAINT**

---

Defendant Mediplex of Massachusetts, Inc. d/b/a SunBridge Care and Rehabilitation for Randolph ("SunBridge") joins in the motion of Defendant Kelly's, pursuant to Fed.R.Civ.P. 12(b)(6), to dismiss Counts I and II of the Plaintiff's Complaint for the reasons stated in their *Memorandum in Support of the Motion of Mediplex of Massachusetts, Inc. d/b/a SunBridge Care and Rehabilitation for Randolph Memorandum for Dismissal of Counts I and II of the Complaint*.

WHEREFORE, Defendant SunBridge requests that this Honorable Court grants its motion to dismiss Counts I and II of the Complaint.

Dated: August 1, 2005

Respectfully submitted,

Mediplex of Massachusetts, Inc. d/b/a  
SunBridge Care and Rehabilitation for  
Randolph

by its attorney,

/s/ Michael Williams

Michael Williams (BBO# 634062)

Lawson & Weitzen, LLP

88 Black Falcon Avenue, Suite 345

Boston, MA 02210-1736

Telephone: 617.439.4990

Facsimile: 617.439.3987